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565 Fifth Avenue, Seventh Floor
New York, NY 10017
TEL 212.880.9567 | FAX 917.591.5245
www.fleischmanlawfirm.com

May 23, 2014

VIA ECF

Hon. Kenneth M. Karas United States District Court United States Courthouse 300 Quarropas Street, Chambers 533 White Plains, New York 10601-4150

Re: Jeffrey Camp et al v. Robert Berman et al., Case No. 14-CV-1049 (KMK)

Dear Judge Karas:

In addition to Jeffrey Camp, Joel Asen and Michael Michigami, my firm now represents counterclaim defendants James Roberts and Cinium Financial Services Corporation ("Cinium"). I am writing pursuant to Rule 1(c) of Your Honor's Individual Practices to respectfully request that the Court approve and so order the enclosed joint Stipulation, a copy of which has also been electronically filed. The Stipulation provides that the time within which Mr. Camp, Mr. Asen, Mr. Michigami, Mr. Roberts and Cinium may submit a pre-motion letter, answer or otherwise respond to the counterclaims is extended to and including June 9, 2014.

Although Jeffrey Camp, Joel Asen and Michael Michigami previously requested an extension to June 2, 2014, this is Mr. Roberts and Cinium's first request for an extension of time. In light of the fact that Mr. Roberts and Cinium only recently obtained counsel, we are respectfully requesting an additional one week extension for our clients.

Respectfully yours,

Shew M Fleischen

Keith M. Fleischman

Enclosure

cc: Kim Landsman, Beth E. Nagalski